

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, ET AL. }
Plaintiffs, } Civil Action File No. 1:17-cv-
v. } 2989-AT
BRIAN KEMP, ET AL. }
Defendants. }

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION TO CONSOLIDATE DEADLINES FOR PLAINTIFFS'
RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS**

Plaintiffs respectfully submit this Memorandum of Law in support of its Unopposed Motion to Consolidate Deadlines for Plaintiffs' Responses to Defendants' Motions to Dismiss, and respectfully request that the Court enter an order consolidating the deadlines for Plaintiffs to respond to all Defendants' motions to dismiss and setting such deadline as October 13, 2017.

ARGUMENT

On September 1, 2017, the Court authorized Plaintiffs to file an amended complaint by September 15, 2017, ordered Defendants to respond by September 29, 2017, and ordered Plaintiff to reply "14 days thereafter." (Dkt. No. 57.)

Plaintiffs subsequently filed a Second Amended Complaint on September 15, 2017. (Dkt. No. 70.) In response, Defendants Maxine Daniels, Michael Coveny, Anthony Lewis, Leona Perry, Samuel Tillman, and Baoky Vu (“Individual DeKalb Defendants”) and Defendant DeKalb County Board of Registrations and Elections (“DeKalb Board”) (together “DeKalb Defendants”) filed a motion to dismiss on September 22, 2017. (Dkt. No. 79.) All other Defendants filed motions to dismiss on September 29, 2017. (Dkt. Nos. 82, 83, and 84.)

Because Plaintiffs have 14 days to respond to Defendant’s motions to dismiss, Plaintiffs face two different response date deadlines for responding to Defendants’ motions to dismiss: an October 6, 2017 deadline for DeKalb Defendants and an October 13, 2017 deadline for all other Defendants. In the interests of avoiding needless and duplicative filing, of efficiency of process, and of conserving party and judicial resources, Plaintiffs file the present Motion. Furthermore, granting this Motion will not delay the progress of this matter. Defendants do not object to the present Motion.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court grant Plaintiffs’ Unopposed Motion to Consolidate Deadlines for Plaintiffs’ Responses to Defendants’ Motions to Dismiss and order the deadline for Plaintiffs’ reply brief

in response to Defendants' motion to dismiss (Dkt. Nos. 79, 82, 83, and 84) to be set to October 13, 2017.

Dated: October 2, 2017

Respectfully submitted,

/s/ Bryan M. Ward _____
BRYAN M. WARD
Georgia Bar No. 736656
MARVIN LIM
Georgia Bar No. 147236
HOLCOMB + WARD, LLP
3399 Peachtree Road NE, Suite 400
Atlanta, GA 30326
Telephone: (404) 601-2803
Facsimile: (404) 393-1554

EDWARD B. SCHWARTZ (*pro hac vice*)
JOE R. CALDWELL, JR. (*pro hac vice*)
STEPTOE & JOHNSON, LLP
1330 Connecticut Avenue, NW
Washington, DC 200036
Telephone: (202) 429-3000
Facsimile: (202) 429-3902

CERTIFICATE OF COMPLIANCE

Pursuant to the Local Rule 7.1(D), Plaintiffs certify that this brief has been prepared in 14-point Times New Roman in compliance with Local Rule 5.1(C).

/s/ Bryan M. Ward
Bryan M. Ward

PROOF OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys of record through the Court's electronic filing service on October 2, 2017.

/s/ Bryan M. Ward
Bryan M. Ward